



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SKW/NCG/GMR
F. #2023R00922

271 Cadman Plaza East
Brooklyn, New York 11201

August 14, 2025

By Email and ECF

Avraham C. Moskowitz, Esq.
Moskowitz Colson Ginsberg & Schulman
80 Broad Street, Suite 1900
New York, NY 10004
Email: amoskowitz@mcsllp.com

Re: United States v. Asif Merchant
Criminal Docket No. 24-362 (EK)

Dear Mr. Moskowitz:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being provided via USAfx, a file sharing platform. The government requests reciprocal discovery from the defendant.

The discovery is being produced pursuant to the Protective Order signed by counsel and entered by the Court on November 7, 2024. ECF No. 22.

The government is providing the following:

- Video footage provided by the Federal Bureau of Prisons, Bates-stamped AM_004535;
- Records from a confidential human source, Bates-stamped AM_004536 and marked as **Sensitive Discovery Material** pursuant to the Protective Order;
- Records provided by Meta, Inc, in response to a search warrant, Bates-stamped, AM_004537;
- The above-referenced search warrant authorizing the search of a Meta account, Bates-stamped AM_004538-AM_004596.

You may examine the physical evidence discoverable under Rule 16, including original documents and electronic devices, by contacting the undersigned Assistant United States Attorneys to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney

By: _____ /s/
Sara K. Winik
Nina C. Gupta
Gilbert M. Rein
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)